

PETER B. MORRISON (SBN 230148)  
 peter.morrison@skadden.com  
 VIRGINIA F. MILSTEAD (SBN 234578)  
 virginia.milstead@skadden.com  
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
 300 South Grand Avenue, Suite 3400  
 Los Angeles, CA 90071  
 Telephone: (213) 687-5000  
 Facsimile: (213) 687-5600

JOHN NEUKOM (SBN 275887)  
 john.neukom@skadden.com  
 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP  
 525 University Avenue, Suite 1400  
 Palo Alto, California 94301  
 Telephone: (650) 470-4500  
 Facsimile: (650) 470-4570

Attorneys for Defendants  
 Ripple Labs Inc., XRP II, LLC, Bradley  
 Garlinghouse, Christian Larsen, Ron Will,  
 Antoinette O’Gorman, Eric van Miltenburg,  
 Susan Athey, Zoe Cruz, Ken Kurson, Ben  
 Lawsky, Anja Manuel, and Takashi Okita

(Plaintiff’s counsel on next page)

**UNITED STATES DISTRICT COURT  
 FOR THE NORTHERN DISTRICT OF CALIFORNIA**

AVNER GREENWALD, individually and on  
 behalf of all others similarly situated,

Plaintiff,

v.

RIPPLE LABS INC., et al.,

Defendants.

CASE NO.: 4:18-cv-04790-PJH

**STIPULATION REGARDING  
 DEFENDANTS’ TIME TO ANSWER OR  
 OTHERWISE RESPOND PURSUANT  
 TO CIVIL L.R. 6-1(a)**

1 (continued from previous page)

2 JOHN T. JASNOCH (SBN 281605)

3 jjasnoch@scott-scott.com

4 SCOTT+SCOTT

5 ATTORNEYS AT LAW LLP

6 600 W. Broadway, Suite 3300

7 San Diego, CA 92101

8 Telephone: (619) 233-4565

9 Facsimile: (619)233-0508

10 THOMAS L. LAUGHLIN, IV

11 tlaughlin@scott-scott.com

12 RHIANA SWARTZ

13 rswartz@scott-scott.com

14 SCOTT+SCOTT

15 ATTORNEYS AT LAW LLP

16 The Helmsley Building

17 230 Park Avenue, 17th Floor

18 New York, NY 10169

19 Telephone: (212) 223-6444

20 Facsimile: (212) 223-6334

21 Attorneys for Plaintiff Avner Greenwald

1 WHEREAS, on August 8, 2018, Defendants Ripple Labs Inc., XRP II, LLC, Bradley  
2 Garlinghouse, Christian Larsen, Ron Will, Antoinette O’Gorman. Eric van Miltenburg, Susan  
3 Athey, Zoe Cruz, Ken Kurson, Ben Lawsky, Anja Manuel, and Takashi Okita (collectively,  
4 “Defendants”), removed this matter from the Superior Court of the State of California, County of  
5 San Mateo (“San Mateo Superior Court”), to the United States District Court for the Northern  
6 District of California;

7 WHEREAS, pursuant to Federal Rule of Civil Procedure 81(c)(2)(C), Defendants’ deadline  
8 to answer, move, or otherwise respond to the complaint was initially August 15, 2018;

9 WHEREAS, pursuant to a stipulation of the parties under Civil Local Rule 6-1A(A), the  
10 parties agreed to extend Defendants’ deadline to answer, move, or otherwise respond to the  
11 complaint until August 29, 2018, to allow the parties to continue discussing whether they could  
12 agree on a lengthier extension of time (ECF No. 6);

13 WHEREAS, Plaintiff Avner Greenwald (“Plaintiff”) has indicated his intent to file a  
14 motion to remand this matter back to the San Mateo Superior Court within 30 days provided by 28  
15 U.S.C. § 1447(c);

16 WHEREAS, following further discussion, the parties have agreed upon a further extension  
17 of time for Defendants to answer, move, or otherwise respond to the complaint until a time after  
18 the Court decides the forthcoming motion to remand in order to avoid unnecessary motion practice  
19 before the Court has decided subject matter jurisdiction;

20 WHEREAS, the stipulated change to Defendants’ time to answer, move, or otherwise  
21 respond to Plaintiff’s complaint will not alter the date of any event or any deadline already fixed by  
22 Court order.

23 THEREFORE, PURSUANT TO CIVIL LOCAL RULE 6-1(A), IT IS HEREBY  
24 STIPULATED AND AGREED, by and between the attorneys for the undersigned parties, as  
25 follows:

26 1. If the Court grants Plaintiff’s forthcoming motion to remand, and this action is  
27 remanded to the San Mateo Superior Court, Defendants’ deadline to answer, move, or otherwise  
28

1 respond shall be in thirty (30) days “from the day the original court receives the case on remand.”

2 Cal. Civ. Proc. Code § 430.90(a)(2).

3       2. If the Court denies Plaintiff’s forthcoming motion to remand, Defendants’ deadline  
4 to answer, move, or other otherwise respond to the Complaint shall be thirty (30) days from the  
5 date the Court enters an order denying the motion to remand.

6       3. Nothing herein shall be deemed to constitute a waiver of any rights, claims,  
7 defenses, motions, or objections that a party may have or make with respect to jurisdiction, venue  
8 and/or the claims set forth in this action.

9       **IT IS SO STIPULATED.**

10 DATED: August 22, 2018

11 SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

12 By:                     /s/Peter B. Morrison                      
13 Peter B. Morrison  
14 Attorneys For Defendants

15 DATED: August 22, 2018

16 SCOTT+SCOTT ATTORNEYS AT LAW LLP

17 By:                     /s/John T. Jasnoch                      
18 John T. Jasnoch  
19 Attorney For Plaintiff  
20  
21  
22  
23  
24  
25  
26  
27  
28

**E-FILING ATTESTATION**

I, Peter Morrison, am the ECF user whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

DATED: August 22, 2018

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

By: /s/Peter B. Morrison  
PETER B. MORRISON